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**IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS**

UNITED STATES OF AMERICA)	CRIMINAL ACTION NO. 05-00027
)	
Plaintiff)	
)	
v.)	SUPPLEMENTAL MEMORANDUM
)	OPPOSING EXCLUSION OF ZHENG
)	EXHIBITS A AND B
ZHENG MING YAN and LIU, CHANG)	
DA)	
)	Date: Aug. 14, 2006
Defendant)	Time:
_____)	

FRE Rule 608(b) is irrelevant to Zheng's exhibits A and B. Rule 608(b) prohibits use of '[s]pecific instances of the conduct of a witness, **for the purpose of attacking or supporting the witness' character for truthfulness**, other than conviction of crime as provided in rule 609, may not be proved by extrinsic evidence.'" (emphasis added). The Rule does not preclude use of Exhibits A & B to rebut an essential element of the sex trafficking charge charged, which is force, coercion, and fraud. Indeed, such evidence is admissible under FRE Rule 405(b) as it rebuts the essential element of the sex trafficking charge which is force, coercion or fraud. The

evidence is also essential to Zheng's defense that the allegations of fraud, force and coercion are contrived as they are a part of a plan by co-defendant Liu, Chang Da to "get back" at Zheng as part of an extremely contentious domestic dispute or "break-up" between them.

Not allowing use of this evidence would also deny Zheng her confrontation rights. *See Murdoch v. Castro*, 365 F.3d 699, 702 (9th Cir. 2004).

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By: /s/ _____
G. Anthony Long